



WELLINGTON E. WEBB
Mayor

CITY AND COUNTY OF DENVER

DEPARTMENT OF ENVIRONMENTAL HEALTH
Chris Veasey, Ph.D. Manager

Environmental Protection Division
201 W. Colfax, Department 1009
Denver, CO 80202
PHONE: (720) 865-5452
FAX: (720) 865-5534

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Mr. Victor Kettlapper
U.S. Environmental Protection Agency
Region VIII (8EPR-SR)
999 18th Street, Suite 300
Denver, CO 80202-2466

**PUBLIC
DOCUMENT**

2003 MAY 30 PM 2:49
EPA REGION VIII
SUPERFUND BRANCH

RE: EPA's proposed expansion of soil sampling efforts at the VB/I-70 Superfund site

Dear Mr. Kettlapper:

You have stated that EPA is proposing to expand soil sampling outside the current boundaries of the VB/I-70 Superfund site, based on the recent recommendations of EPA's internal review board regarding potential site-related concentrations of lead in soil above the proposed cleanup value. We understand that EPA's review board recommended the new sampling area to be initially focused on the triangle between Blake St., Downing St., and approximately 32nd Avenue. Also, we understand the review board recommended that the sampling area be further expanded if additional elevated "smelter-related" properties continue to be discovered as a result of the sampling. We concur with these recommendations, as the data suggest that properties containing elevated levels of lead in soil may be found outside the current site boundaries and an expanded sampling effort may be warranted.

We have identified several issues that we believe should be addressed by EPA's sampling design for the expanded sampling effort.

1. We understand EPA's current plan is to test samples for both arsenic and lead, in the expanded area. We agree, as both arsenic and lead are chemicals of concern for the VB site.
2. We wish to confirm that all property owners in the expanded sampling area will be offered the opportunity of soil removal, if their soil is identified as being elevated in arsenic or lead above the VB/I-70 site cleanup values. Properties identified as being elevated in arsenic or lead in the expanded area should be treated the same as those in the rest of the VB/I-70 site, if we expect property owners to participate in the sampling effort.
3. Prior to the beginning of sampling, EPA should have clearly defined criteria for determining when they are no longer in a geographic area that is "site-related." These criteria should be scientifically defensible and determined a priori, in the sampling

design. The criteria should consider the number of residences that must be sampled to adequately characterize the geographic extent of the site. In addition, the design should define the methodology that will be used to determine if an elevated property is "smelter-related", as EPA's review board has suggested this determines the scope of the sampling effort.

To summarize, EPA should clearly define the potential scope and outcome of sampling, before asking the community to participate. Before being asked for sampling access, the public should be presented with potential cleanup options and know the criteria that will be used to cease the expanded sampling effort.

Finally, as requested, we have provided you with a map of City and County of Denver zoned land-uses for the properties immediately south and west of the VB site. On this map, we have added the concentrations of lead in soil (mg/kg), measured by EPA in the Phase III samples. If you have questions or wish the mapped data in a different format, please contact me at 720 865-5469 or Celia VanDerLoop at 720 865-5458. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene C. Hook", with a long horizontal flourish extending to the right.

Gene C. Hook
Environmental Protection Division

cc: --VB/I70 Working Group (w/out encl.)
Elbra Wedgeworth -- Council District #8 (w/out encl.)
Debbie Ortega -- Council District #9 (w/out encl.)

encl: Map of requested CCOD zoned land-uses, on CD